

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

THE GENERAL HOSPITAL)	
CORPORATION and)	
DANA-FARBER CANCER)	
INSTITUTE, INC.,)	
)	
Plaintiffs,)	C.A. No. 1:18-cv-11360-IT
)	
v.)	
)	
ESOTERIX GENETIC)	
LABORATORIES, LLC and)	
LABORATORY CORPORATION)	
OF AMERICA HOLDINGS,)	
)	
Defendants.)	
)	

JOINT MOTION TO AMEND CASE SCHEDULE

The parties, the plaintiffs The General Hospital Corporation and Dana-Farber Cancer Institute, Inc. and the defendants Esoterix Genetic Laboratories, LLC and Laboratory Corporation of America Holdings (a/k/a Laboratory Corporation of America), hereby jointly move to amend the remaining items on the Court's current case schedule [*see* Dkt. 54, 78] as set forth below.

Task	Current Deadline	Amended Deadline
Service of any subsequent requests for production and interrogatories	January 3, 2020	March 6, 2020
Service of any requests for admission	February 3, 2020	April 3, 2020
Completion of fact depositions	March 3, 2020	May 8, 2020
Completion of fact discovery	March 3, 2020	May 8, 2020
Filing of dispositive motions	April 2, 2020	June 5, 2020

In support of their joint motion, the Parties state that they served initial written discovery requests as well as written responses to those requests in accordance with the current case schedule, and that they recently reached a detailed agreement on how to streamline email discovery and the discovery of other electronically stored information (“ESI”), which will constitute the bulk of document discovery in this case. The parties require the requested additional time to allow them to implement their agreement, to allow sufficient time to review the email and other ESI that will be collected as part of that process, and to allow sufficient time to review email and other ESI that is produced before taking depositions. This parties have not previously asked the Court to amend the schedule in this case.

WHEREFORE, the parties respectfully request that this Court grant their Joint Motion to Amend Case Schedule.

* * *

Respectfully submitted,

Plaintiffs,
THE GENERAL HOSPITAL
CORPORATION and
DANA-FARBER CANCER
INSTITUTE, INC.

By their attorneys,

/s/ Douglas J. Nash
Douglas J. Nash (BBO# 633050)
Carolyn A. Marcotte (BBO# 663616)
Barclay Damon LLP
One Financial Center, Suite 1701
Boston, MA 02111
(617) 274-2900
dnash@barclaydamon.com
cmarcotte@barclaydamon.com

Defendants,
ESOTERIX GENETIC LABORATORIES,
LLC and LABORATORY CORPORATION
OF AMERICA HOLDINGS,

By their attorneys,

/s/ Jaclyn M. Metzinger
James M. Campbell (BBO# 541882)
Christopher R. Howe (BBO# 652445)
Campbell Campbell Edwards & Conroy, P.C.
One Constitution Center, 3rd Floor
Boston, MA 02129
(617) 241-3041
jmcampbell@campell-trial-lawyers.com
chowe@campbell-trial-lawyers.com

Robert I. Steiner (admitted *pro hac vice*)
Jaclyn M. Metzinger (admitted *pro hac vice*)
Kelley Drye & Warren LLP
101 Park Avenue
New York, NY 10178
(212) 808-7800
rsteiner@kelleydrye.com
jmetzinger@kelleydrye.com

Dated: January 6, 2020

CERTIFICATE OF SERVICE

I, Douglas J. Nash, certify that on January 6, 2020, I filed this Joint Motion to Amend Case Schedule on the Court's CM/ECF system, which will electronically serve all counsel of record in this case.

/s/ *Douglas J. Nash*

Douglas J. Nash